



Data Matters: Understanding the Role of Manufactured Home Communities in the Affordable Housing Continuum

Collaborative Research Report

Northcountry Cooperative Foundation &
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Language & Terms Used

Greater Minnesota – In this report, the term Greater Minnesota is used to describe the 80 counties outside the Seven-County Metro. (Seven-County Metro is defined below).

Manufactured Home Community (MHC) – In this report, the term manufactured home community or “MHC” refers to any site or tract of land upon which two or more occupied manufactured homes are located, either free of charge or for compensation. Manufactured home communities are commonly referred to as “mobile home parks,” “trailer parks,” or “trailer courts” and are often referred in the shorthand as “parks” or “courts”. The authors of this report have chosen to use the term manufactured home community or “MHC” as it is the most technically accurate.¹ More information on the differences between manufactured, mobile, and modular housing can be found on the Manufactured Housing Institute (MHI) website.²

Manufactured Home Community Site (MHC Site) – In this report, the term manufactured home community site, “MHC site,” or “site” refers to a single piece of land in a manufactured home community that is licensed with the state in which the MHC is located. MHC sites are also commonly referred to as “lots” or “pads.” Most state regulatory and oversight bodies surveyed for this report used the term “site” to describe the number of licensed lots in an MHC.

Seven County Metro – the Seven County Metro is the seven counties surrounding Minnesota’s Twin Cities, Minneapolis and St. Paul. The region includes: Anoka, Carver, Dakota, Hennepin, Ramsey, Scott, and Washington counties. The official Minneapolis-St. Paul-Bloomington metropolitan statistical area (MSA) recognized by the Census Bureau consists of 16 counties. The report authors chose to divide the state geographically using the Seven County Metro instead of the MSA largely because data on manufactured home communities in the Seven County Metro is available from the region’s planning organization, the Metropolitan Council. The Metropolitan Council has played an important role in understanding the region’s manufactured home communities through periodic reporting and ongoing data collection.³

¹ “Mobile” homes, in the technical sense, stopped being constructed after 1976 when the HUD code was implemented. Any factory-built home constructed after 1976 is considered a “manufactured” home. “*Understanding Today’s Manufactured Housing*,” Manufactured Housing Institute, manufacturedhousing.org/wp-content/uploads/2017/10/Understanding-Manufactured-Housing.pdf

² Manufactured Housing Institute website, manufacturedhousing.org/research-and-data/

³ The Metropolitan Council is the regional planning organization for the Seven-County Metro area. The Council operates the regional bus and rail system and provides several other services for the Metro. The Council also serves as a research and analytical hub. The Council has issued several reports on manufactured home communities, including a 2016 report titled *Manufactured Home Park Preservation Baseline Report*. Find the report online by visiting metrocouncil.org/Housing/Publications-And-Resources/Manufactured-Home-Park-Preservation-Baseline-Report.aspx

Introduction

In 2016, the real estate information company Costar Group released new data on rental housing that is affordable without public subsidy, known as naturally occurring affordable housing or “NOAH.”⁴ The data generated activity across the affordable housing world as funders, developers, and advocates from across the nation hurried to create programs and financing products to safeguard NOAH from private investment. Minnesota has led the nation in NOAH preservation.⁵ The threat of NOAH losses drew the attention of the state’s housing finance agency, which issued a report on the topic in May 2018.⁶

The attention NOAH has received in recent years highlights the important role data plays in affordable housing preservation and underscores the importance for states to “leave no stone unturned” when it comes to affordable housing resources. No state can afford to ignore a single unit of affordable housing, especially in a time of growing unaffordability.⁷

This report aims to shed light on another, often invisible, form of NOAH: manufactured home communities or “MHCs.” There are over 800 manufactured home communities (commonly referred to as “mobile home parks”) in Minnesota.⁸ These land-lease communities contain approximately 45,000 units of naturally-occurring affordable housing and provide homeownership opportunity for thousands of Minnesota families.⁹ Like other NOAH across the state, these affordable communities are at increasing risk of being permanently lost due to MHC closures.¹⁰

Despite their affordability and the growing threat of loss, there is little data available on Minnesota manufactured home communities, which makes it difficult to understand the role MHCs play in the affordable housing continuum. The primary aim of this research project was to create the scaffolding of an MHC database. The secondary aims of the project were: to understand Minnesota’s current data practices by analyzing best practices from other states and to develop a framework for how MHC data collection and management may be improved.

It is the authors’ hope that this project will encourage a larger conversation about manufactured housing’s role in Minnesota’s affordable housing landscape and inform and advise state policymakers, agency administrators, and advocates on the importance that data plays in administering manufactured home community laws.

⁴ Naturally-Occurring Affordable Housing is defined broadly as non-subsidized rental housing that is affordable to households between 40 and 60 percent Area Median Income (AMI). To view the full CoStar report, visit: uli.org/wp-content/uploads/ULI-Documents/ULI_NAAHL_Presentation.pdf

⁵ In 2016, Minnesota made national headlines when Greater Minnesota Housing Fund (GMHF) announced the creation of a \$25 million NOAH investment fund. Fund creators set out to preserve over 1,000 units in the Twin Cities Metro over three years. Freddie Mac announced in June 2017 that it would provide up to \$100 million in debt financing on top of the initial \$25 million investment. noahimpactfund.com/

⁶ *The Loss of Naturally Occurring Affordable Housing (NOAH), Minnesota Housing, May 2018*, mnhousing.gov/get/MHFA_1043456

⁷ According to data from the Decennial Census and American Community Survey, the number of cost-burdened households (spending 30% of more of their income on housing) increased 56% from 350,000 to 547,000 between 2000 and 2017. *Patterson, John. Director of Planning, Research, and Evaluation, Minnesota Housing. (2019, March 11). Email correspondence.*

⁸ *Northcountry Cooperative Foundation (NCF) and University of Minnesota - Center for Urban and Regional Affairs (CURA), Minnesota Manufactured Home Communities (MNMHC) Database, March 2019.*

⁹ Statewide demographic, income, and lot rent information is not available for Minnesota MHCs. The report authors have used a sampling of income data from Northcountry Cooperative Foundation’s cooperative ownership program to illustrate MHC affordability. NCF works with eight MHCs in Minnesota. Of the MHCs that NCF serves, 70% of the residents are at or below 60% of Area Median Income (AMI). Nearly a third have incomes at or below 30% of AMI. *Northcountry Cooperative Foundation, Manufactured Home Community Income Survey Data.*

¹⁰ The majority of Minnesota’s MHCs were built in the last thirty years. Nearly all were built with private infrastructure systems (water, sewer, roads, electric, etc.) Due to poor initial site planning and deferred maintenance, many MHC infrastructure systems have reached, or are reaching, the end of their useful lives. As the systems fail and rehab costs rise, MHC owners often end up closing the community or selling it for redevelopment.

Minnesota Manufactured Home Community (MNMHC) Database

Database Report

The foundation of the Minnesota Manufactured Home Community Database (MNMHC Database) stems from inspections conducted by the Minnesota Department of Health and delegated agencies. These inspections are typically done annually but may occur every three years depending on the assigned risk designation (Low or High) issued by the overseeing authority. The report authors requested these inspection reports, referred to as Mobile Home/Recreational Camping Inspection Reports, from each inspection authority dating five years back. In addition to inspection reports, a general list of MHCs in each respective jurisdiction was also requested.

The Center for Urban and Regional Affairs (CURA) researcher coded each list and combined them into one Excel spreadsheet to identify gaps in information collected across agencies. A guide explaining the fields that were tracked into the database is included as Exhibit B. If the list provided by the inspection authority did not include certain field information, the CURA researcher did not go back and enter the information into the MNMHC Database. (For example, many lists did not include any data on water and sewer connection types.) All entries that were coded solely as Recreational Camping Areas (RCAs) alone were removed from the list. Several properties were coded as both Recreational Camp Areas and Mobile Home Parks. If the property was listed as both, it was kept in the database. Neither the inspection reports nor lists provided broke out the number of RCA units versus number of MHP units.

On the following page is a table illustrating the differences between the updated MNMHC list and the other publicly accessible lists. Notably, the table shows major deficits between the list Minnesota Management and Budget uses to invoice for payments into the Manufactured Housing Trust Fund (MHRTF) and the MNMHC list. This topic is discussed further on page 12.

Summary of the Data Problem

There is little national data on manufactured home communities. Census data, one of the most commonly used housing data resource, is of little use because the data doesn't say whether a home is sited in a land-lease community or on a fee simple piece of land. This lack of site information makes it impossible to study MHCs apart from the larger stock of manufactured homes.

MHC data is commercially available from MH Village, a national online marketplace for buying and selling manufactured homes, and CoStar Group, a commercial real estate data company. These lists have significant gaps in the data collected and are costly to obtain.¹

At the state level, data on MHCs is similarly lacking. There are a handful of MHC directories from a variety of state agencies and nonprofits. Each list varies in the total number of MHCs and tracks different data points, depending on the directory's purpose. The most valuable data comes from Minnesota Department of Health (MDH). However, MDH data is either not publicly available or costly and cumbersome to obtain due to the Department's multiple delegation agreements, a topic which is discussed further on page 20.

The lack of a centralized, publicly accessible, and updated list of MHCs creates challenges for all those involved in the MHC sector, including the state agencies responsible for administering MHC laws and the organizations working to preserve MHCs as an affordable housing strategy.

¹ All Parks Alliance for Change (APAC) ordered a statewide list of Minnesota MHCs in 2013 from MH Village. At that time, the list only accounted for 400 MHCs. NCF obtained a statewide list of Minnesota MHCs from CoStar Group in 2018, which accounted for 177 total communities.

Difference Between Other Publicly-Available MHC Lists and the MNMHC Database

Name of List	Units Reported	Difference from MNMHC	Total MHCs Reported	Difference from MNMHC
2019 MNMHC Database	44,901		805	
2014 All Parks Alliance for Change (APAC) List	48,361	+ 3,460	901	+ 96
2018 Manufactured Housing Relocation Trust Fund (MHRTF) List (from Minnesota Management & Budget)	32,768	- 12,133	461	- 344

Minnesota MHC Closure Data

The MNMHC Database includes a tab on MHC closure data. Closure data was provided by All Parks Alliance for Change (APAC), which keeps a tracking spreadsheet of MHC closures dating back to 1980.

The APAC closure data is approximate and is not an exhaustive accounting of total MHC closures. MHC closure notices were not a statutory requirement in Minnesota until 2005, so closure data before this date is less comprehensive. Before 2005, APAC compiled metro-area closure data from the Metropolitan Council's annual survey data. APAC compiled Greater Minnesota closure data largely anecdotally, from information gathered by residents, community leaders, and news reports.

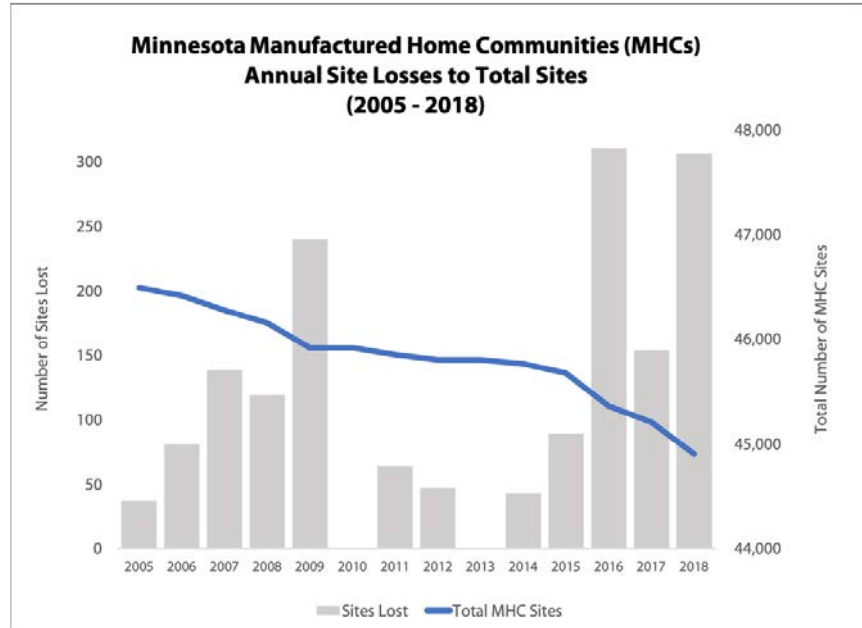
The report authors have included APAC's closure data in the MNMHC Database as a starting point and estimated site losses where information was missing. Further research into pre-2005 closure data is needed but such research was beyond the scope of this report. There is additional work to be done on the database, but that was beyond the scope of this initial report. Work to be completed in the future should include the following:

- Compare the MNMHC Database to the other lists; identify gaps or missing MHCs
- Fill in missing information from inspection reports (number of sites, water/sewer connection type, etc.)
- Obtain license data from Minnesota Department of Health and enter into database
- Break out number of RCAs and MHPs for properties that are categorized as both
- Build out pre-2005 MHC closure data

Key Findings from the Database Project

Since 1980, the state has lost an estimated 3,000 manufactured home community sites.

These losses began accelerating in the late 1990s and have continued at a steady rate since.¹¹ Since 2005, the year formal tracking of MHC closures began, the state has lost over 1,600 MHC sites, an average loss of 116 sites per year. The last three years alone account for nearly fifty percent (50%) of MHC sites lost since closure tracking began.¹²



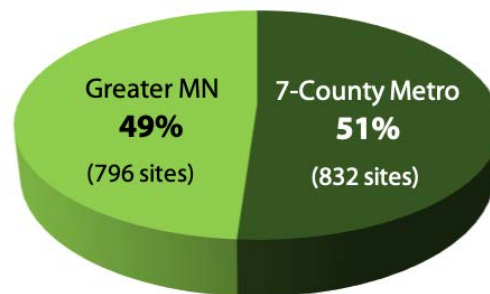
Source: MNMHC Database, March 2019.

	Total Sites in 2005	Total Sites in 2018	Sites Lost Since 2005	Percentage of Total Sites Lost
7-County Metro	16,363	15,531	832	5.1%
Greater-Minnesota	30,166	29,370	796	2.6%

Since 2005, home site losses have occurred at a disproportionately higher rate in the Seven County Metro than Greater Minnesota.

While the Seven County Metro is home to roughly a third of the state's total MHC sites, over half the sites lost since 2005 were lost from Metro counties. The Seven-County Metro lost more than five percent (5.1%) of their MHC sites. Greater Minnesota lost just over two and half percent (2.6%).

MINNESOTA MANUFACTURED HOME COMMUNITY (MHC) SITES LOST BY GEOGRAPHY (2005 - 2018)



Source: MNMHC Database, March 2019.

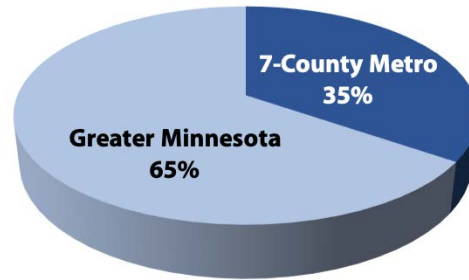
¹¹ MHC closures were not uniformly tracked until 2005 when the Minnesota Legislature enacted changes to §327C.095, which requires MHC owners to file closure notices with Minnesota Department of Health, Minnesota Housing Finance Agency, the local planning jurisdiction and all MHC residents. Visit revisor.mn.gov/statutes/cite/327C/pdf for the full statute. All Parks Alliance for Change (APAC) has informally tracked MHC closures dating back to 1980. Pre-2005 closure data is less reliable for this reason.

¹² Minnesota lost 770 MHC sites between 2016 and 2018. MNMHC Database, March 2019.

Sixty five percent (65%) of Minnesota’s MHC sites are located in Greater Minnesota (29,730 sites).

The share of total communities is even higher for Greater Minnesota, at 90% (723 MHCs). There are over 160 MHCs with 10 sites or fewer in Minnesota, most of which are located in rural areas. This large share of small MHCs accounts for Greater Minnesota’s higher overall share of total MHCs.

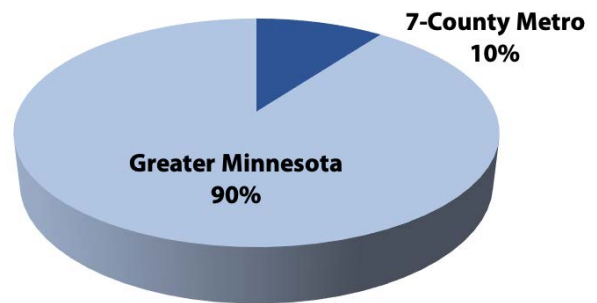
Minnesota Manufactured Home Community (MHC) Sites By Geography



Some MHCs are large enough to be considered a statutory city.

There are 53 MHCs that have more than 200 home sites. The three largest MHCs in the state are all located in Blaine, Minnesota. The largest is Park of the Four Seasons (572 sites), the second largest is Centennial Square Mobile Home Park (566 sites), and the third is Blaine International Village (522 sites).¹³

Minnesota Manufactured Home Communities (MHCs) By Geography

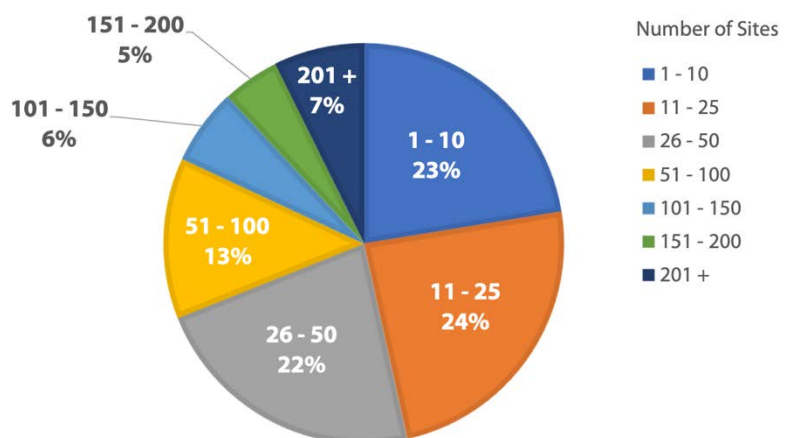


Source: MNMHC Database, March 2019

Most manufactured home communities have < 50 sites

About three-quarters of Minnesota MHCs have 50 sites or less (69%). About half of the state’s MHCs are twenty-five (25) sites or less.¹⁴

MINNESOTA MANUFACTURED HOME COMMUNITIES CATEGORIZED BY NUMBER OF HOME SITES



Source: MNMHC Database, March 2019

¹³ The State of Minnesota defines a Plan B statutory city as municipalities with populations of over 1,000 residents. Office of the Minnesota Secretary of State website: sos.state.mn.us/about-minnesota/minnesota-government/county-local-government/

¹⁴ MNMHC Database, 2019.

MHCs are located in nearly every county in the state.

MHCs are located in 79 of Minnesota’s 87 counties. Anoka County has the highest number of MHC sites with nearly 5,000 sites across twenty-two (22) total communities. Otter Tail County has the highest number of MHCs with 95 total communities. Many of Otter Tail County’s MHC sites are seasonal, not year-round dwellings. See Exhibit B for a complete county table.

Minnesota Counties with Highest Number of MHC Sites

Rank	County Name	Number of MHC Sites
1	Anoka	4,778
2	Dakota	3,896
3	Ramsey	3,064
4	Wright	2,153
5	Olmsted	1,805
6	St. Louis	1,589
7	Blue Earth	1,526
8	Washington	1,482
9	Stearns	1,200
10	Chisago	991

Minnesota Counties with Highest Number of MHCs

Rank	County Name	Number of MHCs
1	Otter Tail	95
2	Beltrami	26
3	Stearns	25
4	Itasca	24
5	Olmsted	24
6	Anoka	22
7	Cass	21
8	Clay	19
9	St. Louis	19
10	Chisago	18

Overview of Minnesota MHC Data Collection

State Statistics

Total Number of MHCs:	805 ¹⁵
Total Number of Leasable MHC Lots:	44,901
Total Number of Subsidized Affordable Housing Units in the State	120,000 ¹⁶
Percent of MHC units to subsidized units:	37%
Primary Oversight Body:	Minnesota Department of Health (MDH)
State Laws Governing MHCs:	Chapter 327.14 - 327.67, Chapter 327B (Manufactured Home Sales), and 327C (Manufactured Home Park Lot Rentals)
Administrative Laws Governing MHCs:	Minnesota Department of Health Chapter 4630 and Department of Labor and Industry Chapter 1350

Oversight of Minnesota Manufactured Home Communities

The manufactured home industry in Minnesota is overseen by several state agencies, including: Minnesota Department of Health (MDH), Minnesota Housing Finance Agency (MHFA), Minnesota Management and Budget (MMB), the Department of Labor and Industry, and the State Attorney General.

The primary oversight body is the Department of Health, which oversees the licensing and habitability laws of MHCs in the state including Chapter 327.14 - 327.67 and the Department's Administrative Rule, Chapter 4630.¹⁷ Minnesota Housing Finance Agency is responsible for administering State Statute Chapter 327C, which concerns community closures and the Manufactured Housing Relocation Trust Fund. The Department of Labor and Industry is responsible for administering laws regarding manufactured home construction, sales, installation, and inspection. This report focuses on the data collection processes of MDH, MHFA, and MMB.

MDH distributes the oversight of MHCs and Recreational Camping Areas (RCAs) across several local health agencies through county delegation agreements.¹⁸ These delegation agreements distribute MHC licensure and inspection responsibilities across fourteen health agencies around the state. Twenty-nine of Minnesota's

¹⁵ MNMHC Database, 2019.

¹⁶ According to the most recent CHAS (Comprehensive Housing Affordability Strategy) data from HUD, Minnesota has about 350,000 rental units that are affordable to households with incomes at or below 50% of AMI. According to HousingLink, Minnesota has about 120,000 units that are affordable through project-based rent assistance, public housing, or units with income/rent restrictions. The remaining roughly 230,000 units are naturally affordable. This applies to all rental units, which are single-family homes to large apartment complexes. *Patterson, John. Director of Planning, Research, and Evaluation, Minnesota Housing. (2019, March 11). Email correspondence.*

¹⁷ In Minnesota, state agencies may adopt administrative rules to make the law it enforces more specific or to govern the agency's organization or procedure. An agency may adopt a rule only after the legislature has enacted a law granting this authority to the agency. Agency rules have the force and effect of law. Minnesota Legislature granted rulemaking authority to the Department of Health in 1951. Administrative Rule 4630, Camps and Mobile Home Parks may be accessed online by visiting [revisor.mn.gov/rules/4630](https://www.revisor.mn.gov/rules/4630).

¹⁸ Like many states surveyed, the oversight of manufactured home communities in Minnesota falls under the same regulatory jurisdiction as Recreational Camping Areas (RCAs).

eighty-seven counties (30%) have active delegated agency agreements in force for MHC licensure and inspections. (See table and map below).

MDH was first granted enforcement authority over manufactured home communities and recreational camping areas in 1951. The enforcement authority allows the Department and each delegated agency to issue correction orders and assess administrative penalty orders. Other enforcement actions include license revocation and closure.¹⁹ Enforcement starts with an inspection and potential issuance of correction orders. Further enforcement actions depend on the severity of the violation and deviation from compliance.

Agency Name	# of Counties in Jurisdiction	Number of MHCs
Aitkin County Environmental Health	1	5
Brown-Nicollet Environmental Health	3	11
Countryside Public Health	4	10
Horizon Public Health	2	14
Kandiyohi County	1	9
Le Sueur County Community Health	1	7
Minnesota Department of Health	54	515
Morrison-Todd County Public Health	2	16
Olmsted County Public Health	1	24
Partnership 4 Health	3	118
Ramsey County Environmental Health	1	16
Southwest Health & Human Services	2	12
Stearns County Environmental Services	1	25
Wadena County	1	10
Waseca County Public Health Services	1	3
Washington County Department of Public Health	1	10
Total	79*	805

Source: MNMHC Database, March 2019.

*There are eight counties that have no manufactured home communities: Cottonwood, Faribault, Lac Qui Parle, Lincoln, Murray, Pipestone, Renville, and Rock.

MDH offsets administration costs for administering the State’s MHC laws through annual licensing fees stipulated in §327.15.²⁰ Fees are submitted to MDH or the delegated agency with the license form. The annual license fee is \$165 plus \$5 for each manufactured home site. An additional \$60 is charged for MHCs with private water and sewer systems.²¹ Delegated agencies keep the fees they collect from MHCs in their jurisdiction. Local agencies have the authority to license (collect fees), inspect, and enforce their local ordinances related to MHCs in their jurisdiction. Most agencies adopt the state rule but they can be more restrictive if they choose.

Data collection queries for MHCs who fall within MDH’s jurisdiction should be directed to the Department of Food, Pools, and Lodging Services by phone (651-201-4500) or email (health.mhprca@state.mn.us). MHCs in

¹⁹ Minnesota Statutes, 2018, section 144.99, revisor.mn.gov/statutes/cite/144.99

²⁰ Licensing, inspections, enforcement and complaint investigation are all part of the program. Minnesota Statutes, 2018, section 327.15, revisor.mn.gov/statutes/cite/327.15

²¹ MDH is also responsible for reviewing and approving licensure for new manufactured home communities. Plans must be submitted to MDH at least 30 days before beginning construction, remodel or addition, or conversion of an existing structure to an MHC. According to MDH staff, the Department rarely sees plans for new MHCs. It’s more common to see additional sites being added to an existing MHC. Licensing information can be found on the Department’s website. mn.gov/eligence/a-z/

counties covered by a delegation agreement should direct data-related queries to the agency contact provided in the Minnesota State and Local Food, Pools, and Lodging Contacts directory.²²

The Role of Other State Agencies in MHC Data Collection & Oversight

§327C.095 Subd. 12 allows for the collection of an annual fee from each MHC owner of \$15.00 for each occupied leased lot.²³ The fees generated are placed in a special fund, called the Manufactured Housing Relocation Trust Fund (MHRTF) and used to reimburse homeowners that are required to relocate due to the full or partial closure or conversion of a manufactured home community.²⁴ There are two state agencies responsible for the tracking and administration of the Fund. Minnesota Management and Budget (MMB) is responsible for invoicing MHC owners and tracking payments into the Fund. Minnesota Housing Finance Agency (MHFA) is responsible for administering the fund and providing an annual report to the Minnesota Legislature on the following:

- Fund balance
- Payments made to claimants from the fund
- Amount of any advances to the fund
- Amount of any insufficiencies encountered during the previous calendar year
- Any administrative charges or expenses deducted from the trust fund balance²⁵

The spreadsheet used to track payments into the Fund in 2017 shows only 461 MHCs in the state and 32,768 units. The report author's compilation of MDH data for the same year shows 805 MHCs were licensed and 44,901 total units (a difference of 344 MHCs and 12,133 units between the two data sets). The report authors were unable to account for the discrepancy between the two data sets other than the following:

- MHC owners are only required to pay \$15 per occupied lot. If half the lots in the community are vacant, the MHC owner only pays and reports on the occupied lots. It is possible MMB only records the number of occupied lots in its tracking spreadsheet.

List Name	MHCs	Sites	Total Anticipated Payments into Trust Fund (Number of Sites x \$15)
2018 Manufactured Housing Relocation Trust Fund (MHRTF) List (from Minnesota Management & Budget)	461	32,768	491,520
2019 MNMHC Database	805	44,901	673,515
MHRTF Compared to 2019 MNMHC Database	-344	-12,133	-\$181,995.00

The report authors were unable to determine which MHFA department is ultimately responsible for administering the Fund and reporting to the Legislature.²⁶ The report authors were also unable to determine where the list MMB uses to track payments into the Fund comes from. Greater inquiry into the enforcement authority either agency has in ensuring MHC owners contribute to the fund is needed.

²² Minnesota State and Local Food, Pools, and Lodging Contacts Book, health.state.mn.us/divs/eh/food/license/delegation.html

²³ The Relocation Trust Fund is capped at \$1 million. MHC owners stop making payments into the fund after the threshold is reached and begin paying back in when the balance dips below the threshold. Minnesota Statute 327.095 Subd. 12, revisor.mn.gov/statutes/cite/327C.095

²⁴ The MHC owner may charge the annual fee back to the affected MHC leaseholders. All relocation payments are equal to the actual relocation costs for relocating the manufactured home to a new location within a 25-mile radius, up to a maximum of \$7,000 for a single-section and \$12,500 for a multi-section home. A summary of the Minnesota Manufactured Home Relocation Trust Fund can be found in the State Attorney General's Manufactured Home Parks consumer guide. ag.state.mn.us/consumer/handbooks/HomeParks/CH09

²⁵ Minnesota Statute, section 327.095 subd. 13, (h), revisor.mn.gov/statutes/cite/327C.095

²⁶ In 2016, the report was issued by the Community Development Director. In 2017, the report was issued by the Assistant Commissioner of Policy and Community Development.

The list provided by MMB at the time data requests were made for this report indicates that although the agency expected payments based on 32,768 total units, the agency only received payment on 29,772 units. Payments into the Fund were actually \$446,580 (about \$45,000 less than anticipated) in 2017. The State Attorney General has power to enforce payments into the Fund and there is also a private right of action. The report authors were unable to find out what interventions MMB or MHFA takes, if any, when MHC owners fail to make payments into the fund.²⁷

Data Collected

General Property Information

The closest thing to a centralized directory of MHC information and data is located on the website of All Parks Alliance for Change (APAC). APAC is a Minneapolis-based nonprofit advocacy organization representing the interests of Minnesota MHC residents. APAC maintains information for homeowners and public officials, including: a clearing house of key manufactured home community laws, rules and regulations, and recent legislation that govern MHCs in the state.²⁸ The website also hosts a publicly-accessible Excel spreadsheet of the MHCs in the state, although the list has not been updated since July 2009.²⁹ The list is organized by county and includes MHC name, owner of record, site address, phone number, and number of units.

The primary mechanism for registering MHCs in Minnesota is through the State's licensure requirement stipulated in §327.15. Although each delegated agency can create their own license application form, most forms track the following data points: the ownership of the MHC, management, and type of water and sewer connection (public or private). The MDH license form was updated in 2017 to include information on evacuation plans and storm shelters. The license form does not track lot rent, site and home vacancy information, or the number of homes moved in and out of the MHC in the last year. MDH and delegated agencies do not offer online registration for MHC owners.

The Department verifies license information as-needed. A total of 513 MHCs submitted for licensure with MDH in 2017.³⁰ At the time data requests were made for this report in summer of 2018, the request for a copy of the MHC licenses from the Department was denied because social security information is listed on the license forms. A list of the MHCs licensed with the Department is public data. The Department was able to provide an Excel spreadsheet summarizing the data from the individual 2017 inspection reports. Data points available from the inspection report list include: MHC name, name of primary operator, site address, license number, risk designation (whether Low or High), and county.³¹ Similar databases were available from each delegated agency. Some of the delegated agencies did not have an Excel spreadsheet summarizing the data from the inspection reports. In such cases, an Excel spreadsheet was created manually from the individual reports.

²⁷ According to APAC Executive Director, Dave Anderson, before the one-million-dollar cap was placed on the Fund in 2012, Management and Budget shared their tracking list with APAC on a regular basis. APAC followed up with MHC owners to encourage them to pay into the fund, and, when necessary, pursued legal action against owners who failed to pay into the fund.

²⁸ All Parks Alliance for Change website: allparksallianceforchange.org

²⁹ This list was compiled in 2009 by the Minneapolis-based public interest advocacy and legal nonprofit, Housing Justice Center (formerly Housing Preservation Project). The list is a compilation of MHCs licensure reports by the Minnesota Department of Health and delegated agencies.

³⁰ *Spanier, Wendy. South Field Operations Unit Supervisor, Minnesota Department of Health. (2019, January 28). Email interview.*

³¹ Risk designation and required inspection frequency are outlined in MDH Administrative Rule. Staff from various delegated agencies reported during interviews that risk designation has less to do with tangible metrics of risk and more to do with the annual reporting requirements associated with each risk category. Low risk MHCs must be inspected every three years, high risk MHCs must be inspected annually. In practice, most MHCs are listed as High risk and inspected annually.

Utility Data

Through the State's annual licensure requirement, MDH collects data on the water and sewer infrastructure systems of Minnesota MHCs, including: water system type (whether municipal or private) and sewage treatment (whether municipal or private septic). Water and sewer system data was not publicly-accessible at the time data requests were made for this report because this information is collected on the annual license application.

Habitability Data

An important mechanism of data collection in Minnesota is the inspection reports generated by MDH and delegated agencies. Depending on the risk designation assigned (see footnote 46), MHCs are inspected annually or every three years. The inspection covers Minnesota Statute §327 and Minnesota Rule 4630. The inspections are designed to identify violations and compliance dates for corrective action.

Issues in MHC Data Collection

Inspection data is publicly available, but procuring the data is complicated and costly, due in large part to the number of delegated agency agreements, which splits data collection among fourteen different agencies. Each delegated agency is responsible for maintaining a list of the MHCs in their jurisdiction, but a publicly-accessible registry of all MHCs in the state, like those available in Vermont and Oregon, is not available. The delegated agency agreements do not dictate a uniform data management system or require delegated agencies to report license and inspection information back to MDH. The decentralization of MHC data collection makes the upkeep of an accurate MHC list nearly impossible due to the resources and time needed to compile the data from the various agencies.³²

Getting an accurate count of the total number of year-round MHCs is also complicated by seasonal MHCs (those which operate for only part of the year, typically as vacation homes). Most delegated agencies include seasonal MHC data in their aggregate list of total MHCs, which skews the total number of year-round MHCs. Certain statutory and administrative rules, like payments into the Manufactured Housing Relocation Trust Fund, apply only to year-round MHCs.

³² To create a complete MHC list, end-users must make separate data requests of both MDH and each of the fourteen delegated agencies. The lists must then be sorted and combined, a process which is both financially onerous and time intensive as each delegated agency may charge a fee for the data requested, which results in several hundred dollars in fees. Several agencies make available only paper or PDF versions of their data, which requires end-users to manually generate an editable Excel spreadsheet of the data provided.

Recommended Changes to Data Collection Processes

- Require all MDH delegated agencies to use the same inspection and license form and require that all delegated agencies report both inspection and license data to MDH annually
- Require MDH and all delegated agencies to keep a separate database of seasonal and year-round MHCs
- Aggregate all license and inspection data in a single database and update annually; make the database available through the Department's website.³³
- Add the following to the Department's Manufactured Home Park license application form:
 - Lot rent information including how utility costs are billed (included in lot rent, master meter with costs split evenly across residents, or individually metered)
 - Occupancy and Vacancy information (the total number of leasable lots, number of sited homes, and number of occupied homes).
 - Number of sites occupied by homeowners versus renters; this information is relevant to the threshold requirement to be defined as an MHC and in calculating the total number of households that should pay into the Relocation Trust Fund
 - Number of homes moved in and out of the community in the last year and the year, make, and model information of each home
- Require MMB to use an updated list of MHCs when invoicing for MHRTF payments

A central, annually-updated database of MHCs would allow other state agencies to improve their own oversight functions, including improving the collection of Manufactured Home Relocation Trust Fund (MHRTF) payments to Minnesota Management and Budget.

³³ This requirement was included in a stand-alone bill during the 2018 Legislative Session. The bill was eventually folded into an Omnibus Supplemental Spending Bill that passed but was vetoed. The bill (HF 282 / SF 239) was introduced again in the 2019 Legislative Session. Bill text can be found on the Office of the Revisor of Statutes website: revisor.mn.gov/bills/bill.php?b=House&f=HF0282&ssn=0&y=2019

Recommended Changes to MHC Oversight & Administration

The scope of this report was limited to the data collection practices of three states' manufactured home communities. However, as the authors conducted interviews for the project and analyzed the various state statute and administrative rules, it became clear that MHC oversight runs closely parallel to data collection practices.

For example, in Vermont and Oregon, where there is a centralized oversight body of MHCs, the data collected is more comprehensive, more frequently updated, and more accessible to the public. In both the case of Vermont and Oregon, the primary oversight body is housed within the housing finance agency as a specific program of the agency. The creation of such an office has several positive effects:

- Centralizes information for ease of use by MHC residents, owners, and the wider public
- Enhances compliance with MHC laws
- Provides an outlet for landlord/tenant dispute resolution out of court

Recommended Changes:

- Create a specific manufactured home community programs similar to Oregon and Vermont. The report authors recommend housing an MHC finance-related program within Minnesota Housing and a separate dispute resolution program through the Attorney General's office. (See Exhibit D and E for example statute language from Oregon and Washington).
- Review the MHRTF collections and payment tracking procedures; consider vesting collections authority to MHFA and eliminate MMB's role in the MHRTF.
- Review administrative and rule-making authorities for Minnesota Housing, Department of Health, and the Attorney General regarding MHC laws.
- Review MHC enforcement authority of Minnesota Housing, Department of Health, and the Attorney General; make changes necessary to ensure compliance with the state's existing manufactured home community laws (See Exhibit F for example statute).

Exhibits

Exhibit A - Vermont & Oregon State Profiles

Why Vermont and Oregon?

At the outset of this report, the authors surveyed organizations across the nation to understand what states exemplified pace-setting standards in data collection, management, and oversight of manufactured home communities. The rubric used to define a “best practice” state was:

- **Centrality of data collection** – a single entity (preferably a state agency) is responsible for collecting and maintaining MHC data
- **Comprehensiveness of data collected** – the entity responsible for data collection collects a wide set of data points, including: occupancy, vacancy, ownership & management, rent, utility, and habitability data
- **Accessibility of data** – the entity responsible for data collection makes the data readily available to the public, ideally online

Vermont and Oregon stood out in each of these categories as evidenced in the following state profiles.

Vermont

State Statistics

Total Number of MHCs:	241
Total Number of Leasable MHC Lots:	6,675 ³⁴
Primary Oversight Body:	Vermont Department of Housing and Community Development (DHCD)
State Law Governing MHCs:	Title 10, Chapter 153

Oversight of Vermont Manufactured Home Communities

Vermont’s manufactured home communities are overseen by the Housing Division of the State’s Department of Housing and Community Development (DHCD)³⁵. The Housing Division administers the Mobile Home Parks Program.

The Department oversees the State’s “mobile home park law,” Title 10, Chapter 153, which protects the safety and rights of owners and residents. DHCD is authorized to enforce this statute in court, impose administrative penalties of up to \$5,000, or refer violations to the Attorney General or State’s Attorney. The

³⁴ The number of occupied leased units (lots) on the 2018 registration was 6,588.

³⁵ The Department of Housing & Community Development (DHCD) coordinates and oversees the implementation of the state’s housing policy, facilitates collaboration among state housing agencies, serves as a resource to housing providers, and promotes production and preservation of affordable housing.

Department administers rules concerning manufactured home community leases, rent increases, sale or closure of MHCs, and habitability standards, and conducts an annual registration of the State's MHCs. The Department serves as a general resource to residents and owners of MHCs alike.³⁶

The Department maintains online MHC resource pages on the Department's website with information for homeowners, community owners, and public officials, including: a clearing house of key manufactured home community laws, rules and regulations, and recent legislation that govern MHCs in the state, a resource page for MHC residents and manufactured homeowners, and a resource page for MHC owners.³⁷ The website also hosts publicly-accessible data and reports, including the annual owner registry list and a directory of available lots and current lot rents in the State's nonprofit and cooperatively-owned MHCs.

DHCD maintains a full-time staff person who is responsible for administering the State's manufactured home community laws. The staff person administers the annual owner registration, coordinates lot rent mediation between MHC owners and residents, and processes MHC sale and closure notices.³⁸

To cover the costs of administering Vermont's MHC laws, §6254 allows for the collection of an annual fee of up to \$12.00 for each leased lot from each MHC owner. The MHC owner may charge this fee back to the affected MHC leaseholders. Fees are submitted to the Department with the annual registration form. The fees generated are placed in a special fund and used by the Department for administering the laws regarding MHCs, including mediation costs and legal fees pursuant to §6252 and §6253.³⁹

Data Collected

General Property Information

V.S.A. 10 §6254 mandates the annual registration of all MHCs with DHCD by no later than September first. The registration tracks a comprehensive set of data points, including information on the ownership of the MHC, management, lot occupancy, and lot rent. The registration also tracks the number of homes moved in and out of the MHC in the last year. The Department has made it easier for owners to register in recent years by providing an online registration option. The Department verifies information as-needed and maintains a publicly-accessible list of the information collected. Every third year, the Department provides a report with the resulting statistics and findings to the Vermont Legislature.⁴⁰ The registry list is available on the Department's website in PDF format. The registration response rate from MHC owners in 2018 was 99% (238 owners of the total 241 MHCs responded - 86% of those used the online registration).

In addition to the annual report, the Department also maintains several companion reports, which provide a succinct analysis of key trends in the MHC industry including: closures, vacancies, and lot rent increases. A reproduction of a table from the Department's 2018 report illustrates these trends. A copy of the full report can be found on the Department's website.⁴¹

³⁶ In 2015, the Vermont Legislature expanded DHCD's enforcement authority to habitability laws. Prior to 2015, DHCD had enforcement authority only over parts of the law pertaining to MHC closures, sales, registration, and mediation. DHCD's enforcement authority allows the Department to assess administrative fines, take MHC owners to court, and refer MHC owners to the Attorney General for civil or criminal violations. 10 V.S.A. §6205, <http://legislature.vermont.gov/statutes/section/10/153/06205>

³⁷ State of Vermont Agency of Commerce and Community Development website: accd.vermont.gov/housing/mobile-home-parks

³⁸ §6237a. requires MHC owners to provide residents and DHCD with at least 18 months advance notice of community closures. §6242 mandates a 45-day notice period for MHC sales.

³⁹ The State of Vermont passed legislation in 1995 that provides for a right to mediation in cases of disputed lot rent increases (§6252). In the event that a lot rent dispute cannot be resolved through mediation, §6253 allows the Commissioner to use fees from the annual MHC registration fees to provide legal representation for the MHC leaseholders. 10 V.S.A. §6252 and §6253, legislature.vermont.gov/statutes/section/10/153/06252

⁴⁰ Although Vermont legislation enacted in 2009 cancelled the requirement for the report after July 1, 2014, the Department has made it an internal policy to continue to produce the report and make it available to the Legislature. Hamlin, Arthur. *Housing Program Coordinator, Vermont Department of Housing and Community Development. (2018, June 7). Teleconference interview.*

⁴¹ accd.vermont.gov/housing/mobile-home-parks/registry

**Vermont Department of Housing & Community Development
History of Parks, Mobile Home Lots, Vacancy, Median Rent**

	2013	2014	2015	2016	2017	2018
Parks	244	242	243	241	241	241
Number of Lots	7,176	7,125	7,129	7,106	7,126	7,113
Vacant Lots	352	312	368	361	372	362
Vacancy Rate	4.9%	4.4%	5.2%	5.1%	5.2%	5.1%
Median Lot Rent	\$305	\$311	\$320	\$325	\$334	\$340

Source: Vermont Department of Housing & Community Development Mobile Home Park Registry Quick Facts Report, November 1, 2018. vermont.gov/housing/mobile-home-parks/registry

Utility Data

Notably, DHCD maintains data on the water and sewer infrastructure systems of the State’s MHCs, including: water system type (municipal or private) and sewage treatment (whether municipal or private septic). Water and sewer system data was initially collected as part of a joint project by the University of Vermont and Champlain Valley Office of Economic Opportunity (CVOEO) in partnership with the Department of Natural Resources. DHCD maintains and updates the water and sewer data as-needed. The data is publicly-accessible via the Department’s website in Excel format and also includes selected registry data and flood hazard information.

Habitability Data

Habitability and public health data of MHCs are not formally tracked. Habitability concerns and complaints are typically handled locally and overseen by the Town Health Officer. Vermont MHCs are subject to the State’s Rental Housing Health Code.

Oregon

State Statistics

Number of MHCs:	1,066
Total Number of Leasable MHC Lots:	62,353
Primary Oversight Body:	Manufactured Communities Resource Center (MCRC), a program of Oregon Housing and Community Services
State Law Governing MHCs:	Chapter 446 (Manufactured Dwellings and Structures; Parks; Tourist Facilities; Ownership Records; Dealers and Dealerships); Title 10, Chapter 90 – Residential Landlord and Tenant, (90.505 – 90.875)

Oversight of Oregon Manufactured Home Communities

Oregon’s manufactured home communities are overseen by the Manufactured Communities Resource Center (MCRC), a division of Oregon Housing and Community Services.⁴² MCRC provides a program overview on their website that describes the purpose and scope of the program:

“The MCRC program was created in 1989 by the Legislature (ORS 446.543) with three main purposes: to provide services and activities to support the improvement of manufactured dwelling park landlord and tenant relationships; to develop and implement a centralized resource referral program for tenants and landlords to encourage voluntary dispute resolution; and to maintain a directory of manufactured dwelling parks.

Since its inception, MCRC has continued to evolve and improve. Legislation passed after 1989 added new responsibilities to the program, including assuring that landlords complied with continuing education and park registration requirements. The MCRC was also charged with monitoring the park closure notification process and providing additional assistance for park residents in the process of closing, including counseling and service referrals.”⁴³

The MCRC program is funded through an annual assessment of \$10 for each manufactured home on rented or leased land. In 2016, the Oregon Legislature added the requirement that landlords register their parks annually, which is \$25 for parks with 20 spaces or less, and \$50 for parks with more than 20 spaces. MCRC is responsible for administering the registration.

The Center maintains several resources on the Center’s website with information for homeowners, community owners, and public officials, including: a clearing house of key manufactured home community laws, rules and regulations, a resource page for MHC residents and manufactured homeowners, and several resources for MHC owners.⁴⁴

⁴² Oregon Housing and Community Services is the state’s housing finance agency, providing financial and program support to create and preserve opportunities for quality, affordable housing for lower and moderate income households. oregon.gov/ohcs/Pages/about-us

⁴³ MCRC Overview, *Manufactured Communities Resource Center (MCRC)*, revised 05/11/2016, <https://www.oregon.gov/ohcs/pdfs/factsheets/factsheet-manufactured-community-resource-center.pdf>

⁴⁴ oregon.gov/ohcs/Pages/manufactured-dwelling-park-services-oregon

The Center maintains several full-time staff who are responsible for administering the State's manufactured home community laws. Staff administer the annual owner registration, coordinates dispute resolution between MHC owners and residents, and process park sale and closure notices.⁴⁵ The Center works closely with MHC residents whose communities are closing. MCRC staff meet with residents to explain park closure laws and provide counseling and service referrals. The report authors were unable to confirm the level of enforcement authority MCRC has in administering MHC laws.

Data Collected

General Property Information

ORS 446.543(2)(c) mandates that MCRC maintain a current list of MHCs, indicating the total number of spaces in each park.⁴⁶ ORS 90.732 requires that every landlord of an MHC register in writing with the MCRC. The registration tracks ownership and management information, lot occupancy and vacancy, community status (open or closing), and the facility classification (whether family or 55+).⁴⁷ The Center has made it easier for owners to register in recent years by providing an online registration option. The report authors were unable to confirm the registration response rate from MHC owners in 2018. The registry database is available on the Center's website in PDF format, and, notably, via an online, interactive ArcGIS map. The map displays the locations of all active MHCs reported to the Center as of the first of the year. MHC size, community management contact information, and legislative district and legislator contact information is listed for each MHC. Map users can overlay Census tract boundaries and American Community Survey data as part of their search.⁴⁸

Utility Data

The report authors were unable to confirm what utility information, if any, the State of Oregon tracks.

Habitability Data

The report authors were unable to confirm what habitability and/or public health data, if any, are tracked by the State of Oregon. Oregon MHCs are subject to the state's rental housing health code.

⁴⁵ Legislation passed by the Oregon Legislature in 2007 requires MHC owners to provide tenants with 365 days' notice and pay tenants \$6,000, \$8,000, or \$10,000, depending on the size of their homes. ORS 90.645, oregon.gov/ohcs/CRD/mcrc/docs/2018-Chapter-090.htm - oar090732. Displaced residents are also eligible to apply for a tax credit of \$5,000. oregon.gov/ohcs/Pages/manufactured-dwelling-park-closures-oregon

⁴⁶ oregon.gov/ohcs/CRD/mcrc/docs/2018-Chapter-446.htm - oar4465432c

⁴⁷ oregon.gov/ohcs/Pages/manufactured-dwelling-park-owner-registration.aspx

⁴⁸ The American Community Survey data is from the 5-Year Estimates for 2012-2016 and includes data on population, median household income, median age, poverty rate, and the number of manufactured homes constructed prior to 1980. geo.maps.arcgis.com/apps/webappviewer/index.html?id=aa82f25127b438e9ffe0298e5d14425

Exhibit B - MNMHC Database Field Directory

The table below describes the fields used to track data in the database. A translation of each field title and a description of the data in the field is included, where needed.

Field Name	Field Name Translation	Field Name Description
source	Source	Shows whether the data came from MDH or another delegated agency
estab/permit?	Establishment Permit	Assigned by MDH/delegated agency
park_name	Park Name	Property name
#_of_sites	Number of Sites/Units	Number of leasable lots in the community
site_address	Property Address	
site_address2	Property Address 2	
city	City	
state	State	
zip	Zip	
cnty_name	County Name	
mailing_address	Mailing Address	Address where mail concerning the property should be directed, if different from the property address.
mailing_address2	Mailing Address 2	
mailing_address_city	Mailing Address City	
mailing_address_state	Mailing Address State	
mailing_address_zip	Mailing Address Zip	
identified_owner	Identified Owner	
primary_operator	Primary Operator	Name of the person or entity responsible for the operations and maintenance of the property; could be actual owner or the property manager, etc.
hazard	Hazard Designation	Assigned by MDH/delegated agency
oper_id	Operator ID	Assigned by MDH/delegated agency
water	Water Connection Type	"P" for private connection (well); "M" for municipal connection
sewer	Sewer Connection Type	"P" for private connection (septic); "M" for municipal connection
oper_type	Operator Type	"MHP" for Mobile Home Park; "RCA" for Recreational Camping Area; a property can have both types assigned
pool_rec	Pool	MDH tracks the amount of pools and type (private or public)
email	Email	
phone	Phone	
phone_description	Phone Description	
additional_phone	Additional Phone	
additional_phone_description	Additional Phone Description	

Exhibit C – Minnesota MHC County Table

County Name	Number of MHCs	% of Total MN MHCs	Number of MHC Sites	% of Total MN MHC Sites	Sites Lost Since 1980	% Sites Lost Since 1980
Aitkin	5	0.6%	68	0.2%		
Anoka	22	2.7%	4,778	11.8%	261	5%
Becker	17	2.1%	513	1.3%	12	2%
Beltrami	26	3.2%	896	2.2%	272	23%
Benton	7	0.9%	818	2.0%		
Big Stone	1	0.1%	44	0.1%		
Blue Earth	12	1.5%	1,526	3.8%	70	4%
Brown	3	0.4%	352	0.9%		
Carlton	7	0.9%	222	0.5%		
Carver	5	0.6%	954	2.3%	16	2%
Cass	21	2.6%	399	1.0%		
Chippewa	5	0.6%	170	0.4%		
Chisago	18	2.2%	991	2.4%		
Clay	19	2.4%	515	1.3%	13	2%
Clearwater	2	0.2%	18	0.0%	42	70%
Cook	4	0.5%	59	0.1%		
Cottonwood	0	0.0%	0	0.0%		
Crow Wing	18	2.2%	673	1.7%	81	11%
Dakota	17	2.1%	3,896	9.6%		
Dodge	7	0.9%	349	0.9%		
Douglas	12	1.5%	436	1.1%	22	5%
Faribault	0	0.0%	0	0.0%		
Fillmore	8	1.0%	102	0.3%	10	9%
Freeborn	4	0.5%	281	0.7%		
Goodhue	18	2.2%	928	2.3%		
Grant	3	0.4%	17	0.0%	12	41%
Hennepin	5	0.6%	627	1.5%	591	49%
Houston	15	1.9%	269	0.7%		
Hubbard	17	2.1%	190	0.5%		
Isanti	3	0.4%	392	1.0%		
Itasca	24	3.0%	485	1.2%	47	9%
Jackson	3	0.4%	48	0.1%		
Kanabec	6	0.7%	289	0.7%		
Kandiyohi	9	1.1%	307	0.8%	120	28%
Kittson	3	0.4%	58	0.1%		
Koochiching	9	1.1%	189	0.5%		
Lac Qui Parle	0	0.0%	0	0.0%		
Lake	3	0.4%	33	0.1%		
Lake Of The Wood	17	2.1%	489	1.2%	18	4%
County Name	Number of MHCs	% of Total MN MHCs	Number of MHC Sites	% of Total MN MHC Sites	Sites Lost	% Sites Lost

					Since 1980	Since 1980
Le Sueur	7	0.9%	200	0.5%	17	8%
Lincoln	0	0.0%	0	0.0%		
Lyon	6	0.7%	320	0.8%		
Mahnomen	2	0.2%	20	0.0%		
Marshall	7	0.9%	135	0.3%		
Martin	5	0.6%	198	0.5%		
McLeod	11	1.4%	597	1.5%		
Meeker	8	1.0%	288	0.7%		
Mille Lacs	8	1.0%	312	0.8%		
Morrison	9	1.1%	261	0.6%		
Mower	7	0.9%	264	0.6%		
Murray	0	0.0%	0	0.0%		
Nicollet	7	0.9%	734	1.8%		
Nobles	1	0.1%	106	0.3%	35	25%
Norman	3	0.4%	63	0.2%		
Olmsted	24	3.0%	1,805	4.4%	27	1%
Otter Tail	95	11.8%	921	2.3%		
Pennington	6	0.7%	414	1.0%		
Pine	15	1.9%	397	1.0%		
Pipestone	0	0.0%	0	0.0%		
Polk	14	1.7%	414	1.0%		
Pope	2	0.2%	38	0.1%		
Ramsey	16	0.0%	3,064	7.5%	340	10%
Red Lake	1	0.1%	35	0.1%		
Redwood	6	0.7%	199	0.5%		
Renville	0	0.0%	0	0.0%	71	100%
Rice	9	1.1%	828	2.0%		
Rock	0	0.0%	0	0.0%		
Roseau	15	1.9%	636	1.6%		
Scott	6	0.7%	719	1.8%		
Sherburne	4	0.5%	412	1.0%	37	8%
Sibley	5	0.6%	111	0.3%	33	23%
St. Louis	19	2.4%	1,589	3.9%	105	6%
Stearns	25	0.0%	1,200	3.0%	100	8%
Steele	3	0.4%	480	1.2%		
Stevens	1	0.1%	30	0.1%		
Swift	3	0.4%	28	0.1%		
Todd	7	0.9%	117	0.3%		
Traverse	1	0.1%	20	0.0%		
Wabasha	14	1.7%	556	1.4%		
Wadena	10	1.2%	143	0.4%		
Waseca	3	0.4%	229	0.6%	27	11%
Washington	10	1.2%	1,482	3.6%	115	7%

County Name	Number of MHCs	% of Total MN MHCs	Number of MHC Sites	% of Total MN MHC Sites	Sites Lost Since 1980	% Sites Lost Since 1980
Watonwan	1	0.1%	79	0.2%		
Wilkin	4	0.5%	121	0.3%	27	18%
Winona	12	1.5%	799	2.0%	71	8%
Wright	17	2.1%	2,153	5.3%		
Yellow Medicine	1	0.1%	3	0.0%		

Exhibit D – Oregon Statute §446.543

Oregon Statute

Chapter 446: Manufactured Dwellings and Structures; Parks; Tourist Facilities; Ownership Records; Dealers and Dealerships

§446.543

446.543 Office of Manufactured Dwelling Park Community Relations; duties of Director of Housing and Community Services Department; rules. (1) An Office of Manufactured Dwelling Park Community Relations is established in the Housing and Community Services Department.

(2) The Director of the Housing and Community Services Department shall, through the use of office personnel or by other means:

(a) Undertake, participate in or cooperate with persons and agencies in such conferences, inquiries, meetings or studies as might lead to improvements in manufactured dwelling park landlord and tenant relationships;

(b) Develop and implement a centralized resource referral program for tenants and landlords to encourage the voluntary resolution of disputes;

(c) Maintain a current list of manufactured dwelling parks in the state, indicating the total number of spaces;

(d) Not be directly affiliated, currently or previously, in any way with a manufactured dwelling park within the preceding two years; and

(e) Take other actions or perform such other duties as the director deems necessary or appropriate, including but not limited to coordinating or conducting tenant resource fairs, providing tenant counseling and service referrals related to park closures and providing outreach services to educate tenants regarding tenant rights and responsibilities and the availability of services.

(3) The office shall adopt rules to administer ORS 90.645 and 90.655. [1989 c.918 §8; 1995 c.28 §1; 1997 c.577 §45; 1999 c.676 §29; 2003 c.21 §3; 2005 c.22 §318; 2007 c.906 §9]

Exhibit E – Washington Statute §59.30.010

Washington Statute

Chapter 59, Sections 30.010 - 30.090: Manufactured/Mobile Home Communities—Dispute Resolution And Registration

59.30.010 Findings—Purpose—Intent.

(1) The legislature finds that there are factors unique to the relationship between a manufactured/mobile home tenant and a manufactured/mobile home community landlord. Once occupancy has commenced, the difficulty and expense in moving and relocating a manufactured/mobile home can affect the operation of market forces and lead to an inequality of the bargaining position of the parties. Once occupancy has commenced, a tenant may be subject to violations of the manufactured/mobile home landlord-tenant act without an adequate remedy at law. This chapter is created for the purpose of protecting the public, fostering fair and honest competition, and regulating the factors unique to the relationship between the manufactured/mobile home tenant and the manufactured/mobile home community landlord.

(2) The legislature finds that taking legal action against a manufactured/mobile home community landlord for violations of the manufactured/mobile home landlord-tenant act can be a costly and lengthy process, and that many people cannot afford to pursue a court process to vindicate statutory rights. Manufactured/mobile home community landlords will also benefit by having access to a process that resolves disputes quickly and efficiently.

(3)(a) Therefore, it is the intent of the legislature to provide an equitable as well as a less costly and more efficient way for manufactured/mobile home tenants and manufactured/mobile home community landlords to resolve disputes, and to provide a mechanism for state authorities to quickly locate manufactured/mobile home community landlords.

(b) The legislature intends to authorize the department of revenue to register manufactured/mobile home communities and collect a registration fee.

(c) The legislature intends to authorize the attorney general to:

(i) Produce and distribute educational materials regarding the manufactured/mobile home landlord-tenant act and the manufactured/mobile home dispute resolution program created in RCW [59.30.030](#);

(ii) Administer the dispute resolution program by taking complaints, conducting investigations, making determinations, issuing fines and other penalties, and participating in administrative dispute resolutions, when necessary, when there are alleged violations of the manufactured/mobile home landlord-tenant act; and

(iii) Collect and annually report upon data related to disputes and violations, and make recommendations on modifying chapter [59.20](#) RCW, to the appropriate committees of the legislature.

Exhibit F – Vermont Statute §6205

Vermont Statute
Title 10: Conservation and Development
Chapter 153: Mobile Home Parks
Subchapter 001: General Provisions

§6205. Enforcement; penalties

- (a) A mobile home park owner who violates or fails to comply with a provision of this chapter violates [9 V.S.A. § 2453](#).
- (b) If a mobile home park owner violates this chapter, the Department shall have the authority:
- (1) to impose an administrative penalty of up to \$5,000.00 per violation;
 - (2) to bring a civil action for damages or injunctive relief, or both, in the Superior Court for the unit in which a violation occurred; and
 - (3) to refer a violation to the Attorney General or State's Attorney for enforcement pursuant to subsection (a) of this section.
- (c)(1) A leaseholder may bring an action against the park owner for a violation of sections 6236-6243 of this title.
- (2) The action shall be filed in the Superior Court for the unit in which the alleged violation occurred.
 - (3) No action may be commenced by the leaseholder unless the leaseholder has first notified the park owner of the violation by certified mail at least 30 days prior to bringing the action.
 - (4) During the pendency of an action brought by a leaseholder, the leaseholder shall pay rent in an amount designated in the lease, or as provided by law, which rental amount shall be deposited in an escrow account as directed by the Court. (Added 1969, No. 291 (Adj. Sess.), § 12, eff. date, see note under § 6201 of this title; amended 1973, No. 193 (Adj. Sess.), § 3, eff. April 9, 1974; 1983, No. 235 (Adj. Sess.), § 2; 1989, No. 229 (Adj. Sess.), § 5; 2001, No. 133 (Adj. Sess.), § 4, eff. June 13, 2002; 2007, No. 176 (Adj. Sess.), § 55; 2009, No. 154 (Adj. Sess.), § 62; 2015, No. 8, § 1.)